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7		
8	UNITED STATES BANKRUPTCY COURT	
9	DISTRICT OF NEVADA	
10	In Re:	BK-S-09-20197-LBR
11	FLORELEE MONZON	Date:January 14, 2010
12		Time: 1:30 p.m.
13	Debtor.	Chapter 13
14		
15	SUPPLEMENTAL OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN	
16	COMES NOW, U.S Bank Home Mortgage (hereinafter "Secured Creditor") and files this	
17	Supplemental Objection to Confirmation of Chapter 13 Plan stating as follows:	
18	Secured Creditor is the first deed of trust holder on 32 East Serene Avenue, #216, Las Vegas.	
19	Nevada 89123 (hereinafter "subject property"), and is owed over \$372,000.00. The Debtor filed a	
20	motion to value and reduce Secured Creditor's lien to \$115,000.00. Secured Creditor subsequently	
21	filed a response to Debtor's motion to value – said response, filed on September 9, 2009, is	
22	incorporated herein by reference.	
23	Secured Creditor asserts that this Court should not confirm the proposed plan because 1) there is	
24	a complete lack of disclosure by the Debtor as detailed below, and 2) it is not feasible.	
25	///	
	///	
26		

## A. Lack of Disclosure

Secured Creditor's opposition to Debtor's motion to value demonstrates that there are too many unanswered questions in the Debtor's attempt to treat the subject property as a rental and strip a large portion of Secured Creditor's interest in the same. The Debtor did not disclose the information necessary to answer these questions and prove she is being truthful with the Court. Until the Debtor can come before this Court with more information, the Court should not confirm this plan.

## B. Lack of Feasibility

The Debtor does not have sufficient income to meet her plan requirements as can be seen in a simple review of her Schedule "I" and looking at the proposed plan. She clearly does not have the capability to meet her plan obligations and her request for confirmation should be denied

Until the Debtor can come before this Court with more information or income to properly fund a plan, the Court should not confirm this plan. It does not have a reasonable likelihood of success.

WHEREFORE, Secured Creditor asks that this Court deny confirmation and dismiss this case.

DATED this 4th day of January , 2010

WILDE & ASSOCIATES

By

GREGORY L. WILDE, ESQ.

Attorneys for Secured Creditor

## Certificate of Facsimile

I certify that on Tanuary 4, 2010, I served a copy of the foregoing opposition on Debtor's Counsel by facsimile as follows:

Edward S. Coleman, Esq. Coleman Law Associates, a Professional Law Corporation Fax No. (702) 537-2800

